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Attorneys for Defendant
UNITED PUBLIC WORKERS,
AFSCME, LOCAL 646, AFL-CIO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

JEANNE ENDO,)	CIVIL NO. CV03-00563 LEK
)	
Plaintiff,)	DEFENDANT UNITED PUBLIC
)	WORKERS' OBJECTIONS TO
vs.)	EXHIBITS; CERTIFICATE OF
)	SERVICE
UNITED PUBLIC WORKERS,)	
AFSCME LOCAL 646, AFL-CIO,)	
)	
Defendant,)	
)	
vs.)	
)	
GARY W. RODRIGUES,)	TRIAL DATE: May 13, 2008
)	
Third-Party Defendant.)	
)	
)	

DEFENDANT UNITED PUBLIC WORKERS’
OBJECTIONS TO EXHIBITS

Defendant United Public Workers, AFSCME Local 646, AFL-CIO (“UPW”) objects to the exhibits pre-marked by the opposing parties for the reasons noted below.

<u>Exhibit</u>	<u>Objection</u>
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1	Relevance (FRE Rules 401, 402, 403); Hearsay (FRE Rules 801, 802)
2	Hearsay (FRE Rules 801, 802)
3	Hearsay (FRE Rules 801, 802)
4	Hearsay (FRE Rules 801, 802)
5	Hearsay (FRE Rules 801, 802)
6	Hearsay (FRE Rules 801, 802); Document is incomplete, missing pages (FRE Rule 1001)
7	No objection
8	No objection
9	No objection
10	No objection
11	No objection, subject to proper foundation
12	Hearsay (FRE Rules 801, 802)

- 13 Hearsay (FRE Rules 801, 802)
- 14 Hearsay (FRE Rules 801, 802)
- 15 Hearsay (FRE Rules 801, 802)
- 16 Hearsay (FRE Rules 801, 802)
- 17 Relevance (FRE Rules 401, 402, 403, 404)
- 18 Relevant (FRE Rules 401, 402, 403, 404), Hearsay (FRE Rules 801,
802)
- 19 Hearsay (FRE Rules 801, 802); Document is incomplete; part of other
document (FRE Rule 1001)
- 20 No objection
- 21 Relevance (FRE Rules 401, 402, 403)
- 22 Relevance (FRE Rules 401, 402, 403)
- 23 Relevance (FRE Rules 401, 402, 403)
- 24 Relevance (FRE Rules 401, 402, 403)
- 25 Relevance (FRE Rules 401, 402, 403)
- 26 Relevance (FRE Rules 401, 402, 403)
- 27 Relevance (FRE Rules 401, 402, 403)
- 28 Relevance (FRE Rules 401, 402, 403)
- 29 Relevance (FRE Rules 401, 402, 403)

30 Relevance (FRE Rules 401, 402, 403)

31 Relevance (FRE Rules 401, 402, 403)

32 Relevance (FRE Rules 401, 402, 403)

33 Relevance (FRE Rules 401, 402, 403)

34 Relevance (FRE Rules 401, 402, 403)

35 Relevance (FRE Rules 401, 402, 403)

36 Relevance (FRE Rules 401, 402, 403)

37 Relevance (FRE Rules 401, 402, 403)

38 Relevance (FRE Rules 401, 402, 403)

39 Relevance (FRE Rules 401, 402, 403)

40 Relevance (FRE Rules 401, 402, 403)

41 Relevance (FRE Rules 401, 402, 403)

42 Relevance (FRE Rules 401, 402, 403)

43 Relevance (FRE Rules 401, 402, 403)

44 Relevance (FRE Rules 401, 402, 403)

45 Relevance (FRE Rules 401, 402, 403)

46 Relevance (FRE Rules 401, 402, 403)

47 Relevance (FRE Rules 401, 402, 403)

48 Relevance (FRE Rules 401, 402, 403)

49 Relevance (FRE Rules 401, 402, 403)

50 Relevance (FRE Rules 401, 402, 403)

51 Relevance (FRE Rules 401, 402, 403)

52 Relevance (FRE Rules 401, 402, 403)

53 Relevance (FRE Rules 401, 402, 403)

54 Relevance (FRE Rules 401, 402, 403)

55 Relevance (FRE Rules 401, 402, 403)

56 Relevance (FRE Rules 401, 402, 403)

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58 Relevance (FRE Rules 401, 402, 403)

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60 Relevance (FRE Rules 401, 402, 403)

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66 Relevance (FRE Rules 401, 402, 403)

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81 Relevance (FRE Rules 401, 402, 403)

82 Relevance (FRE Rules 401, 402, 403)

83 Relevance (FRE Rules 401, 402, 403)

84 Relevance (FRE Rules 401, 402, 403)

85 No objection

86 No objection

87	No objection
88	No objection
89	No objection
90	No objection
91	No objection
92	No objection
93	No objection
94	No objection
95	Relevance (FRE Rules 401, 402, 403); Hearsay (FRE Rules 801, 802)
96	No objection
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99	No objection
100	No objection
101	No objection
102	Relevance (FRE Rules 401, 402, 403)
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104	Relevance (FRE Rules 401, 402, 403)
105	Relevance (FRE Rules 401, 402, 403)

106 Relevance (FRE Rules 401, 402, 403)

107 Relevance (FRE Rules 401, 402, 403)

108 Relevance (FRE Rules 401, 402, 403)

109 Relevance (FRE Rules 401, 402, 403)

110 No objection

111 No objection

112 Relevance (FRE Rules 401, 402, 403)

113 No objection

114 No objection

115 No objection

116 No objection

117 No objection

118 No objection

119 No objection

120 No objection

121 No objection

122 No objection

123 No objection

124 No objection

125	No objection
126	No objection
127	No objection
128	No objection
129	No objection
130	No objection
131	No objection
132	No objection
133	No objection
134	Relevance (FRE Rules 401, 402, 403); Incomplete document (FRE Rule 1001)
135	No objection
136	Relevance (FRE Rules 401, 402, 403)
137	Relevance (FRE Rules 401, 402, 403)
138	Relevance (FRE Rules 401, 402, 403)
139	Relevance (FRE Rules 401, 402, 403)
140	Relevance (FRE Rules 401, 402, 403)
141	Relevance (FRE Rules 401, 402, 403)
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143 Relevance (FRE Rules 401, 402, 403)

144 Relevance (FRE Rules 401, 402, 403)

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146 Relevance (FRE Rules 401, 402, 403)

147 Relevance (FRE Rules 401, 402, 403)

148 Relevance (FRE Rules 401, 402, 403)

149 Relevance (FRE Rules 401, 402, 403)

150 Relevance (FRE Rules 401, 402, 403)

151 Relevance (FRE Rules 401, 402, 403)

152 Relevance (FRE Rules 401, 402, 403)

153 No objection

154 Relevance (FRE Rules 401, 402, 403)

155 Relevance (FRE Rules 401, 402, 403)

156 Relevance (FRE Rules 401, 402, 403)

157 Relevance (FRE Rules 401, 402, 403)

158 Relevance (FRE Rules 401, 402, 403)

159 Relevance (FRE Rules 401, 402, 403)

160 Relevance (FRE Rules 401, 402, 403)

161 Relevance (FRE Rules 401, 402, 403)

162 Relevance (FRE Rules 401, 402, 403)

163 Relevance (FRE Rules 401, 402, 403)

164 Relevance (FRE Rules 401, 402, 403)

165 Relevance (FRE Rules 401, 402, 403)

166 Relevance (FRE Rules 401, 402, 403)

167 Relevance (FRE Rules 401, 402, 403)

168 Relevance (FRE Rules 401, 402, 403)

169 Relevance (FRE Rules 401, 402, 403)

170 Relevance (FRE Rules 401, 402, 403)

171 Relevance (FRE Rules 401, 402, 403)

172 Relevance (FRE Rules 401, 402, 403)

173 Relevance (FRE Rules 401, 402, 403)

174 Relevance (FRE Rules 401, 402, 403)

175 Relevance (FRE Rules 401, 402, 403)

176 Relevance (FRE Rules 401, 402, 403)

177 Relevance (FRE Rules 401, 402, 403)

178 Relevance (FRE Rules 401, 402, 403)

179 Relevance (FRE Rules 401, 402, 403)

180 Relevance (FRE Rules 401, 402, 403)

181 Relevance (FRE Rules 401, 402, 403)

182 Relevance (FRE Rules 401, 402, 403)

183 Relevance (FRE Rules 401, 402, 403)

184 Relevance (FRE Rules 401, 402, 403)

185 Relevance (FRE Rules 401, 402, 403)

186 Relevance (FRE Rules 401, 402, 403)

187 Relevance (FRE Rules 401, 402, 403)

188 Relevance (FRE Rules 401, 402, 403)

189 Relevant (FRE Rules 401, 402, 403, 404); Hearsay (FRE Rules
 801,802)

190 Relevant (FRE Rules 401, 402, 403, 404); Hearsay (FRE Rules
 801,802)

191 Relevant (FRE Rules 401, 402, 403, 404); Hearsay (FRE Rules
 801,802)

192 No objection

193 No objection

194 No objection

300 No objection

301 Incomplete/redacted document (FRE Rule 1001)

302 Hearsay (FRE Rules 801, 802)

DATED: Honolulu, Hawaii, April 29, 2008.

/s/ Charles A. Price

JAMES E. T. KOSHIBA

CHARLES A. PRICE

Attorneys for Defendant

UNITED PUBLIC WORKERS,

AFSCME, LOCAL 646, AFL-CIO